

Message

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Sent: 8/3/2022 5:59:22 PM
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Subject: Thank you - Regional Haze follow-up
Attachments: PrairieRoseSeminole_ND-HazeTestimony5.31.22.pdf; Potential Emission Reductions from Top Polluters in EPA Region8 (1).pdf; Oil- Gas_Controls_FactSheet_3.9.20 FINAL.pdf; March 6 2020_Four Factor RP Analysis_Oil and Gas Sector.pdf

Administrator Becker & Staff,

Thank you for taking the time to meet with us this morning and listen to our concerns. To ensure connectivity moving forward, I have cc'd the full contact list of attendees from today's call on this email. I know the folks on here would be happy to supply clarifying information to any of the points we outlined this morning. And to that point, NPCA will be following up with some additional content detailing the disparate environmental justice impacts that you requested.

We sincerely appreciate your commitment to connect directly with stakeholders and community members on the ground, impacted by these sources. We are, all of us, eager to support that community engagement. I know staff will be reaching out with suggested opportunities moving forward.

I'll note that the topics we covered represent an overview of concerns from across the region, themes we have seen present in multiple SIPs. This list is not fully comprehensive of the specific concerns in each state, which can be found in our previously forwarded technical comments, but in general we have seen;

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- States have been inconsistent in how they applied, defined, or failed to define cost effective thresholds. We would like to see EPA set a standard of implementation that recognizes the need for additional pollution controls to improve visibility in the 2nd planning period.
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- States have relied on unenforceable closure dates to limit the cost effectiveness of controls like SCR. We would like to see EPA establish enforceable closure dates.
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- States have failed to require actual controls on their largest sources, some of which are the largest sources of haze in national parks in the entire country. EPA should ensure that best available controls are implemented at the largest haze sources after nearly 20 years of planning.
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- States have failed to consider oil & gas controls across the board. See attached documents for recommended action.
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- With some exception, states have not adequately considered environmental justice impacts from regional haze sources. Intersections between public health and haze pollutants are profound. Further context to follow.

Attached you will find the materials mentioned on today's call, including;

- 1.
2. Slides: Available NOx & SOx reductions from major sources in Region 8
- 3.
- 4.
5. Testimony: Prairie Rose Seminole, citizen of MHA Nation, resident of Hazen ND, National Parks Conservation Association, Indigenous Fellow
- 6.
- 7.
8. Factsheet: "Controlling Regional Haze Pollution from the Oil & Gas Sector"
- 9.
- 10.
11. Report: "Oil & Gas Sector Reasonable Progress Four Factor Analysis of Controls for Five Source Categories"

As you mentioned you have yet to determine the level of EPA resource that will be dedicated to Round 2 Regional Haze Planning, we would like to reiterate the importance and urgency of full implementation of this rule. Many of the largest haze sources in our region remain uncontrolled after two decades of planning. Some of the available emission reductions cannot be achieved through any other mechanism, and in the cases where other rules may apply, it would be inappropriate for those potential future measures to count for compliance under the current haze planning. We simply do not have another decade to waste before cleaning up these sources, not when such significant reductions are available now.

Thank you again for your time and consideration,

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Lindsay Beebe

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